

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

RECEIVED  
JUL 10 2006  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WORCESTER

JANE DOE,  
SUZETTE LINDGREN,  
ANDREW MOYER,  
on behalf of themselves and all others  
similarly situated, and  
MASSACHUSETTS COALITION  
FOR THE HOMELESS, and  
CENTRAL MASSACHUSETTS  
HOUSING ALLIANCE,

Plaintiffs,

v.

CITY OF WORCESTER,  
WORCESTER PUBLIC LIBRARY, and  
WORCESTER PUBLIC LIBRARY  
BOARD OF DIRECTORS,

Defendants.

CIVIL ACTION NO.:

MOTION FOR LEAVE  
TO PROCEED UNDER A  
PSEUDONYM

**06-40133**

Doe et al v. City of Worcester et al

Doc. 3

Now comes plaintiff Jane Doe ("Ms. Doe"), by her attorney, and moves for leave to proceed under a pseudonym and states as follows:

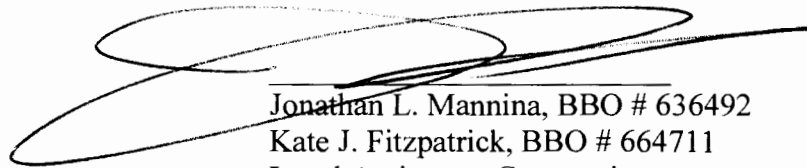
1. Ms. Doe is a real person who presently resides in Worcester County, Massachusetts.  
Ms. Doe is not her true and complete name.
2. Ms. Doe is a victim of domestic violence and both she and her child have been subjected to physical abuse at the hands of her ex-husband. Ms. Doe fears that she and her child, who is not a plaintiff in this action, will be at risk of substantial physical violence if Ms. Doe's true name is revealed. The facts underlying these

assertions are contained in Ms. Doe's accompanying Memorandum in Support of Jane Doe's Motion for Leave to Proceed Under a Pseudonym, and Affidavit in Support of Motion for Leave to Proceed Under a Pseudonym, dated July 5, 2006 (filed under seal with the Court).

WHEREFORE, plaintiff Jane Doe prays that this Court grant her leave to proceed under a pseudonym in this cause.

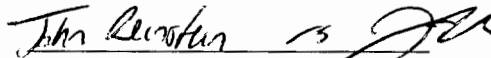
Respectfully submitted,

Date: July 6, 2006



Jonathan L. Mannina, BBO # 636492  
Kate J. Fitzpatrick, BBO # 664711  
Legal Assistance Corporation  
of Central Massachusetts  
405 Main Street, Fourth Floor  
Worcester, Massachusetts 01608  
(508) 752-3718

Date: July 6, 2006

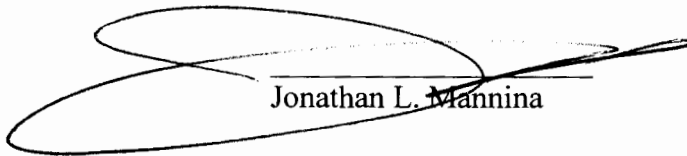


John Reinstein, BBO # 416120  
American Civil Liberties Union  
of Massachusetts  
211 Congress Street, Suite 300  
Boston, Massachusetts 02110  
(617) 482-3170

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I, Jonathan L. Mannina, certify that I conferred with counsel for the defendant in an effort to resolve or narrow the issues that led to the filing of this motion, as required by Local Rule 7.1.

Dated: July 6, 2006

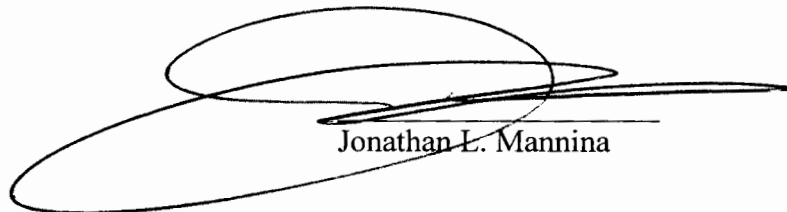


Jonathan L. Mannina

CERTIFICATE OF SERVICE

I, Jonathan L. Mannina, attorney for the plaintiffs, hereby certify that I have on this 6<sup>th</sup> day of July, 2006, mailed the within, postage prepaid, to David M. Moore, Esq, City Solicitor, 455 Main Street, Room 301, Worcester, MA 01608.

Dated: July 6, 2006



Jonathan L. Mannina